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### No. 84-3040 Plaintiff's Proposed Decree

United States District Court for the District of Columbia

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ANN B. HOPKINS

v.

Defendant.

PLAINTIFF'S PROPOSED DECREE

- 1/ For purposes of this decree, "partner" is the same as "principal."

6. Defendant is permanently enjoined from discriminating against women candidates for partnership on the basis of sex and from permitting sex stereotypes to play a part in the partnership admissions process.

7. Defendant shall adopt a written policy prohibiting discrimination based on sex in partnership admission. The policy shall state that partners should be sensitive to the possibility that their evaluations of women candidates may be influenced by sex stereotyping, and that acting on such stereotypes or otherwise discriminating is not permitted and may lead to a reduction of future share allocations. This policy shall be included with the materials on partnership admissions normally distributed annually to each partner.

8. Defendant's Policy Board shall insure that all comments made about women candidates for partnership are reviewed to determine whether any particular comments appear to be reflective of sex stereotyping. If so, the Board shall conduct an inquiry. Unless it is clear following the inquiry that the comments were not the product of stereotyping, then the particular comments, as well as all negative remarks made by the partner in question about the candidate being evaluated, will be disregarded by the Policy Board.

9. Defendant shall maintain for a period of five years complete records relating to the partnership admissions process, including records of all comments made about women candidates, all inquiries concerning any comments that may have been reflective of stereotyping, and all actions taken with respect to

partners who engaged in stereotyping or other forms of discrimination. These records shall be made available to counsel for plaintiff annually within a reasonable period following the end of defendant's fiscal year.

10. Plaintiff is entitled to reasonable attorneys' fees and expenses for legal work performed in this Court, the Court of Appeals and the Supreme Court. Fees are to be handled in accordance with Local Rule 215. The parties shall report within 30 days whether agreement on fees has been reached and, if full agreement has not been reached, shall identify all areas of agreement and disagreement.

Date: \_\_\_\_\_

\_\_\_\_\_  
UNITED STATES DISTRICT JUDGE